

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Retail Access Optimization Initiative

Docket No. N2011-1

Rebuttal Testimony of

Rita Zilinski

On Behalf of

The National Association of Postmasters of the United States

NAPUS-T-1

My name is Rita Zilinski and I am a retired Postmaster and member of the National Association of Postmasters of the U.S. In addition, I served as president and secretary-treasurer of NAPUS' West Virginia Chapter. I retired from the U.S. Postal Service, having served as Postmaster and Officer-in-Charge of four communities, all in small towns and rural areas of the state over a period of two decades. Within this capacity, I managed levels-11, -13 -J, -15 and -18 post offices, and administered city and highway contract route carriers out of these offices. As the former Postmaster of such communities, I believe I am keenly aware of the needs, both postal and non-postal, of the Americans I have had the honor to serve. This appreciation of the societal value of a post office is widespread among the Postmasters whom I represent. I am tremendously proud of my tenure with the U.S. Postal Service and of the individuals for whom I have worked.

I offer testimony in this matter because I believe the Postal Service's efforts to review 2,800 post offices for discontinuance – most that serve small town and rural America – will have an adverse impact on residential postal customers and small businesses in those geographic areas. I recognize that my work experience is limited to one state, but my experience is not unique. It is important to recognize that, for small town and rural America, post offices are not simply a place to buy a stamp, or drop off a letter; they are a fundamental part of the community they serve – a civic and communal center-of-gravity. This intimate relationship between a post office and the community it serves may not be the same as in a post retail facility in an urban and suburban environment. When the flag is raised outside a rural post office, it represents civic presence and communal validation, a qualitative attribute missing from the establishment of a so-called Village Post Office or

other alternative retail postal establishments. Moreover, once an alternative retail outlet is closed, the community has no assurance that any postal services will be locally available.

Besides civic pride and governmental presence, as a Postmaster, I was always extremely concerned about the security and safety of our mail. The Postal Service has a responsibility to protect the integrity of the mail; the closure of a post office can very well jeopardize the confidence in security, particularly in rural areas. Rural customers, such as those I served, either received a post office box because rural mail delivery was not an option, or chose to rent for the security and timeliness of delivery. Closing a post office forces postal customers in many small towns or rural communities, like the ones I served, to receive their mail through a highway contract route via a single family mailbox erected in front of their residence or at the end of a rural road, or by a neighborhood delivery collection box unit (NDCBU). NDCBUs are key-operated mail receptacles, so-called cluster boxes that are installed at a designated area. The mail receptacles usually are not sheltered or illuminated, making them vulnerable to theft and weather. In weather-impacted areas, such as rural West Virginia, the locks on NDCBU boxes easily freeze in the winter, making it virtually impossible to open. In addition, carriers often inadvertently damage the boxes when using hammers to loosen the ice from around the doors so they can deliver the mail. Also, during the winter, snow, snow drifts and ice have precluded deliveries to the boxes. Snow removal or, I should say the lack of snow removal, often makes delivery to the unit impossible for carriers.

I would add that, during my postal tenure, I trained as a “security control officer,” qualifying me to perform security audits on post offices in my area. I also trained as an “aviation security officer,” enabling me to ensure that mail was handled according to aviation security guidelines. Consequently, I was quite attuned to the fact that vandalism and theft of curbside boxes was a growing problem. Even my own mailbox was vandalized. In communities I served, mailboxes were destroyed and mail was scattered throughout the roadway. I also reported unauthorized people I personally observed rummaging through rural neighborhood mailboxes. In addition, mail was removed from several mailboxes and bundled together, then placed other residents’ mailboxes at the end of a route. Outgoing mail was stolen out of residents’ rural mailboxes with customers unaware until their utility company contacted them. Many customers have found mail scattered around their mailboxes and along their roads. Many of my postal customers refused to place outgoing mail in their rural mailboxes; instead, they brought their outgoing mail to my post office – an option that would not exist in communities whose post office is closed. I have had customers move their mail from highway contract mail boxes to a Post Office Box because their box had been destroyed and mail continually damaged. As a rural Postmaster, security is paramount when it comes to our mail.

Let me provide the commission with a recent example of how the absence of post office-protected collection can harm mail service in rural communities. This past year, mail was removed from a mailbox; a customer had placed five pieces of outgoing mail in the box. The thieves defaced the checks and cashed them at two businesses. When this occurred, it was the customer’s responsibility to contact the sheriff’s department and report the

damage. A person was arrested for the crime, although most of the time, nothing is done when vandalizing is reported, except the filing of a report.

Along highway contract routes that I administered, rural mailboxes were often erected in locations where the customers could not see the carrier deliver the mail. Consequently, customers could not promptly retrieve their mail, placing the mail is at risk. As a retired Postmaster, I would not entrust my mail to a highway contract route curbside box or a neighborhood delivery collection box unit.

I understand the Postal Service believes that rural carriers provide access that is comparable to the services provided at a post office. Postal officials think accessibility is ensured by a postal customer being able to transact postal business at his or her rural mail box. Unfortunately, those who promote this idea, most likely, have spent little time traveling the byways of rural West Virginia or other rural areas of our country. It extremely difficult, or is not a viable option, for many rural residents to wait by their mailboxes for the arrival of their mail carriers. Rural boxes may be down a long drive from a residence or place of business. Particularly, during winter months or inclement weather, these postal customers would have to wait, exposed to the elements, by their mailboxes. In addition, rural costumers may have to travel from their places of business to meet their carriers to transact business when their convenient and accessible post office is no longer open.

In sum, rural communities, such as the ones I served in West Virginia, need access to the mail security and mail sanctity ensured by their post offices. I do not believe the Postal Service's current review takes into account these unique needs of rural postal customers.

Thank you.